

Flathead County Board of Health

April 16, 2015

The EPA invites comments on the proposed action to add the Anaconda Aluminum Co Columbia Falls Reduction Plant to the National Priorities List. The comment period will conclude on June 2, 2015. Comments can be submitted via the following methods:

1. Go to [www.regulations.gov](http://www.regulations.gov) and follow the online instructions for submitting comments using FDMS Docket # EPA-HQ-SFUND-2015-0139.
2. For written documents, please send the original and three copies to the following address:

Docket Coordinator, Headquarters  
U.S. Environmental Protection Agency  
CERCLA Docket Office (Mail Code – 5350T)  
1200 Pennsylvania Avenue, NW  
Washington, DC 20460

3. Hand Delivery or Express Mail, please send the original and three copies to the following address:

Docket Coordinator, Headquarters  
U.S. Environmental Protection Agency  
CERCLA Docket Office  
1301 Constitution Avenue, NW  
EPA West, Room 3334  
Washington, DC 20004  
(8:30 a.m. – 4:30 p.m. Mon – Fri)

4. Email address – [superfund.docket@epa.gov](mailto:superfund.docket@epa.gov)

**Discussion Summary/Outline**

- I. Site Background and Site Reassessment Results
- II. Need for Additional Investigation
- III. National Priority List Proposal and Next Steps

**I. Site Background and Site Reassessment Results**

*EPA conducted a Site Reassessment sampling event in September and October 2013.*

Objectives of Site Reassessment/Sampling

EPA has completed a screening level investigation designed to answer the following questions:

Identify types of hazards on site?

Has there be an observed release of contaminants to groundwater, surface water, and/or surface soils?

Site Reassessment focused on areas down gradient of West Landfill, Center Landfill, East Landfill, North Percolation Ponds, South Percolation Ponds. These are areas believed to be of higher risk of impacting environment. **Refer to Figure 2 hand out.**

Based on our investigation and research, EPA believes spent pot liner was landfilled on site from 1950s to 1980s, up until the point in time when spent pot liner became regulated as a hazardous waste by the Resource Conservation and Recovery Act. Spent pot liner is known to contain cyanide. Fluoride sludge was landfilled on site as well.

Site Reassessment Sample Results

As part of the Site Reassessment, EPA compared down gradient sample results to up gradient samples to determine if down gradient samples had elevated concentrations of contaminants as compared to samples collected up gradient of potential sources.

Samples from groundwater monitoring wells at the site down gradient of sources had contaminants above Maximum Contaminant Levels (MCL) including cyanide, fluoride, arsenic, chromium, lead and selenium.

Groundwater on site is not consumed, so MCL comparison is for illustrative and comparison purposes only. Although groundwater on site is not consumed, the contaminants in the groundwater would have potential to migrate.

Five domestic wells sampled as part of Site Reassessment; two had detectable levels of cyanide, but below MCLs.

Columbia Falls' municipal wells were not sampled as part of the site reassessment, but these wells are monitored through Safe Drinking Water Act. No indications of contaminants.

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Flathead River, or its sediments, had detections of cyanide, manganese and fluoride. Cedar Creek had detections of cyanide. Further downstream Flathead River samples did not have detectable amounts of contaminants in either water or sediment samples.

#### Follow up residential well sampling

Responding to cyanide detections in domestic wells during the initial investigation, EPA's has since sampled domestic wells in neighborhood down gradient of plant during two additional sampling events.

April 2014 – sampled 20 domestic wells.

November 2014 – sampled 10 domestic wells.

During both sampling events, cyanide was not detected.

#### Summary of Site Reassessment Sampling Results

Groundwater is impacted at the site.

Most recent two rounds of domestic well samples have not shown contaminants.

However, contaminants have previously been detected in domestic wells.

Contaminants have been detected in environmental media (groundwater, surface water/sediments) and would have the potential to continue migrating.

## **II. Need for additional information to answer the following questions:**

What are the sources at the site leading to the contamination?

What is the nature and extent of the contamination?

What is the scope of the ground water contamination?

Are there current or future risks to Flathead River and Cedar Creek?

Are there current or future impacts to nearby receptors potentially including groundwater users, potential site workers, surface water users, etc?

This list is meant to highlight the need for additional information. It is not meant to be an exhaustive list of questions.

## **III. National Priorities List, Comment Period, and Next Steps**

After negotiations between MDEQ and CFAC were called off by CFAC, EPA proposed to add the site to the National Priorities List. Governor Bullock concurred with this action in a letter to EPA on February 17<sup>th</sup>. The proposed action began a 60 day public comment period, which will end June 2<sup>nd</sup>. EPA invites interested parties to submit their comments via one of the four methods discussed in the public notice (**refer to public notice hand out**).

#### Next Steps

The next steps in the Superfund process are the Remedial Investigation and Feasibility Study. The objectives of the Remedial Investigation/Feasibility Study (RI/FS) are to assess site conditions, determine the nature and extent of contamination, and evaluate alternatives to the extent necessary to select a remedy. This will expand on the screening level investigation already completed at the site.

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Generally, the EPA first looks to the Potentially Responsible Parties (PRPs) to perform the Remedial Investigation/Feasibility Study under a legally binding agreement with EPA oversight. If the PRPs are not willing to complete the work under a legally binding agreement, the EPA would then look to other authorities, including completing an EPA led Remedial Investigation and then recover the costs from the PRPs.